

EXECUTION VERSION

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RONALD BETHUNE, on behalf of himself and
all others similarly situated,

Plaintiff,

-against-

LENDINGCLUB CORPORATION,
WEBBANK, STEEL PARTNERS
HOLDINGS, L.P., THE LENDING CLUB
MEMBERS TRUST, and DOES 1 through
10, inclusive,

Defendants.

Case No. 1:16-cv-02578 (NRB)

STIPULATION AND [PROPOSED]
ORDER OF DISMISSAL WITH
PREJUDICE

Pursuant to Federal Rule of Civil Procedure 41(a), Plaintiff Ronald Bethune, by and
through his attorneys, and Defendants LendingClub Corporation, WebBank, Steel Partners
Holdings, L.P., and The Lending Club Members Trust, by and through their attorneys, hereby
jointly move for an order dismissing with prejudice all claims against all Defendants in the
above-captioned action, with each party to bear its own costs, expenses, and attorneys' fees.

SO ORDERED this _____ day of _____, 2018.

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Dated: New York, New York

January 5, 2018

March

SIMMONS HANLY CONROY LLC

By: Mitchell Breit

Mitchell Breit
112 Madison Avenue
New York, NY 10016-7416
Telephone: (212) 784-6400
Facsimile: (212) 213-5949
Email: mbreit@simmonsfirm.com

MCCUNE WRIGHT AREVALO, LLP
Richard D. McCune
3281 East Guasti Road, Suite 100
Ontario, CA 91761
Telephone: (909) 557-1250
Facsimile: (909) 557-1275
Email: rdm@mccunewright.com

Attorneys for Plaintiff Ronald Bethune

MORRISON & FOERSTER LLP

By: Jessica Kaufman

(MM13 by
permission
of Jessica
Kaufman)
Mark P. Ladner
Jessica Kaufman
250 West 55th Street
New York, New York 10019-9601
Telephone: (212) 468-8000
Facsimile: (212) 468-7900
E-mail: mladner@mofo.com
E-mail: jkaufman@mofo.com

Attorneys for Defendants LendingClub
Corporation and The Lending Club
Members Trust

SIDLEY AUSTIN LLP

By: Benjamin R. Nagin

(MM13 by
permission
of Jessica
Kaufman)
Benjamin R. Nagin
Jon W. Muenz
787 Seventh Avenue
New York, NY 10009
Telephone: (212) 839-5300
Facsimile: (212) 839-5599
Email: bnagin@sidley.com
Email: jmuenz@sidley.com

Mark E. Haddad, admitted pro hac vice
555 West Fifth Street, Suite 4000
Los Angeles, CA 90013
Telephone: (213) 896-6000
Facsimile: (213) 896-6690
Email: mhaddad@sidley.com

Attorneys for Defendant WebBank

EXECUTION VERSION

KAPLAN RICE LLP

By:

Howard J. Kaplan (MMB by
permissive
of (less in
Kaufman)

Howard J. Kaplan

Joseph A. Matteo

142 West 57th Street, Suite 4A

New York, NY 10019

Telephone: (212) 235-0300

Facsimile: (212) 235-0301

Email: hkaplan@kaplanrice.com

Email: jmatteo@kaplanrice.com

*Attorneys for Defendant Steel Partners
Holdings, L.P.*